

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:20-cr-00054

NEDELTCHO VLADIMIROV,

Defendant.

**DEFENDANT'S MOTION FOR AN EXTENSION OF TIME TO FILE
OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the present deadline of November 19, 2021, to file objection to Presentence Investigation Report to December 3, 2021. In support thereof, the Defendant states as follows:

1. Defendant's counsel has been involved in several federal criminal matters.
2. Defendant's counsel needs additional time to meet with his client and to file any appropriate objections to the Presentence Investigation Report.
3. An extension of an additional two (2) weeks would not prejudice any party in this matter.

THEREFORE, the Defendant moves this Honorable Court to extend by an additional two (2) weeks to December 3, 2021, the deadline to file objections to the Presentence Investigation Report and for such other and further relief as this Court deems just.

NEDELTCHO VLADIMIROV

By Counsel.

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon

Timothy J. LaFon (#2123)
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Phone: (304)344-4440
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion for An Extension of Time to File Objections to the Presentence Investigation Report”** has been served upon all parties via the Court’s electronic filing system on the 17th day of November, 2021:

Andrew Tessman, Esquire
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (#2123)
Attorney for Defendant